

1 Brett Lewis, Esq. (*pro hac vice*)
2 *Brett@iLawco.com*
3 Michael Cilento, Esq. (*pro hac vice*)
4 *Michael@iLawco.com*
5 **LEWIS & LIN, LLC**
6 77 Sands Street, 6th Floor
7 Brooklyn, NY 11201
8 Tel: (718) 243-9323
9 Fax: (718) 243-9326

10 Ji-In Lee Houck (SBN 280088)
11 *jiin@houckfirm.com*
12 **THE HOUCK FIRM**
13 16501 Ventura Blvd, Suite 400-199
14 Encino, CA 91436
15 Tel: (888) 446-8257
16 *Attorneys for VPN.COM LLC*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 VPN.COM LLC,
20 *Plaintiff,*

21 vs.

22 GEORGE DIKIAN;
23 QIANG DU; and
24 JOHN DOE

25 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

26 **DECLARATION OF**
27 **MICHAEL D. CILENTO, ESQ.**

28 **DECLARATION OF MICHAEL CILENTO**

1 I, Michael D. Cilento, Esq., declare as follows:

2 1. I make this Declaration upon my own personal knowledge and the
3 records, files, and knowledge of my law firm, Lewis & Lin, LLC, counsel to the
4 Plaintiff VPN.COM LLC (“VPN”) in this action.
5

6 2. VPN filed this action via Complaint on June 29, 2022.
7

8 3. VPN thus, pursuant to FRCP 4(m) serve Defendants by September
9 27, 2022 (90 days from the Complaint being filed).
10

11 4. My law firm and I performed investigations into the matters stated
12 in the Complaint as well as into the Defendants George Dikian (“Dikian”) and
13 Qiang Du (“Du”) both before and after the Complaint in this action was filed.
14

15 5. As part of those investigations, we did both public and paid
16 background searches on Dikian in order to determine where Dikian resides or
17 otherwise to find a suitable address to serve process on Dikian. Those searches
18 yielded only one known possible physical address for Dikian: 1219 Vine Street,
19 Los Angeles, CA, 90038.
20

21 6. Based on the above, we hired a process server to serve Dikian at
22 the Vine Street address. The process server attempted service on July 11, 2022,
23 but the address was occupied by an unknown business, and the individual the
24 process server spoke to said that George Dikian was unknown to the individual.
25
26
27
28

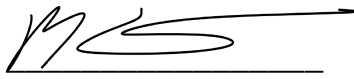
DECLARATION OF MICHAEL CILENTO

1 7. Following this failed service attempt, we again performed further
2 searches to determine another viable address to serve Dikian, but we were
3
4 unsuccessful.

5 8. Similarly, as to Du, my law firm and I, as well as VPN, have been
6
7 unable to determine an exact location within Hong Kong where Du resides.

8 I declare under penalty of perjury that the foregoing is true and correct.

9
10 Executed this 25th day of August, 2022 in Brooklyn, New York, USA.

11
12 

13 Michael Cilento
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF MICHAEL CILENTO